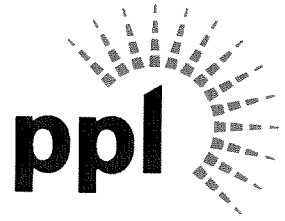


PPL Montana, LLC
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PPL MONTANA, LLC

May 2, 2006

Mr. Bob Jeffrey, Air Quality Specialist
Air Quality Policy and Planning Section
Montana Department of Environmental Quality
1520 E. Sixth Avenue
P.O. Box 200901
Helena, MT 59620-0901

Dear Mr. Jeffrey:

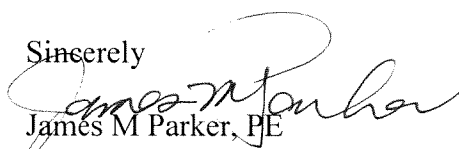
In regard to the draft BART modeling protocol, PPL Montana offers the comments discussed below. We would appreciate DEQ's serious consideration of these views.

The DEQ is proposing to conduct the BART modeling analysis using maximum actual daily average emissions that occurred over the three-year modeling period. PPL Montana believes that the 90th percentile level of daily average emissions over the period would be more representative of typical emissions while still being at the upper end of the frequency distribution.

In the Introduction of the Draft Modeling Protocol, the DEQ notes that alternatives to the proposed protocol may be acceptable. If PPL Montana engages a modeling consultant to conduct BART modeling, we will inform the DEQ if the consultant recommends changes to the modeling procedures, background concentrations or particulate speciation data presented in the draft proposal. Additionally, concerning approval of any alternatives to the protocol, PPL Montana feels that, because this is a state modeling protocol, approval of any alternatives by EPA, while preferred, should not be required if the time required to obtain such approval would jeopardize Montana's BART modeling schedule.

Thank you for the opportunity to comment on the latest draft of the BART rule. Please call Mark Lambrecht or me or if you should have questions.

Sincerely


James M Parker, PE
Manager, Compliance Services

CC: Reid Clemmer
Steve Christian
Dan Gatch
Neil Dennehy
Mark Lambrecht